

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

CYNTHIA HOOPS,)
)
)
) Case No.: 4:16-cv-01543 AGF
Plaintiff,)
)
)
-vs-)
)
MEDICAL REIMBURSEMENTS OF)
AMERICA, INC. et al.,)
)
Defendants.)

**NON-PARTY RIGHTCHOICE MANAGED CARE, INC.'S
CONSENT MOTION TO PLACE DOCUMENTS UNDER SEAL**

Non-party RightCHOICE Managed Care, Inc. ("RightCHOICE") moves this Court for an Order placing Docket Entries 16-1, 75-20, 82-1, and 100-4, the Network Agreement between RightCHOICE and Mercy and Affiliates, LLC (the "Network Agreement"), under seal. In support of this Motion, RightCHOICE states as follows:

1. The Network Agreement is a confidential agreement containing sensitive business information with respect to both Mercy and Affiliates, LLC (and the entities on whose behalf Mercy and Associates, LLC entered into the agreement) and RightCHOICE.
2. The Network Agreement cannot be redacted in such a way that will abate the threat of harm to both sets of parties that could result from the public disclosure of this document. *See* E.D.Mo. L.R. 83-13.05(A)(1) ("Upon a showing of good cause the Court may order that documents filed in a civil case be received and maintained by the Clerk under seal.").
3. RightCHOICE therefore seeks to place Docket Entries 16-1, 75-20, 82-1, and 100-4 under seal.

4. Counsel for both Plaintiff Cynthia Hoops and Defendant Mercy Hospitals East Communities have consented to RightCHOICE's request.

5. RightCHOICE further requests that upon termination of this matter, in light of the nature of the information contained in the Network Agreement, the Network Agreement remained sealed indefinitely pursuant to Local Rule 83-13.05(A)(2).

6. A proposed Order placing Docket Entries 16-1, 75-20, 82-1, and 100-4 under seal is attached hereto.

WHEREFORE, RightCHOICE respectfully requests that the Court enter an Order directing the Clerk's Office to put under seal Docket Entries 16-1, 75-20, 82-1, and 100-4, and for such other and further relief as the Court deems appropriate.

Respectfully submitted,

LEWIS RICE LLC

DATED: July 2, 2018

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served via this Court's ECF system to the following parties this 2nd day of July, 2018.

/s/ Neal F. Perryman